

February 8, 2016

Document Processing Desk (DCI/PRD)  
Attn: Kelly Ballard  
U.S. Environmental Protection Agency  
One Potomac Yard (South Building)  
2777 South Crystal Drive  
Arlington, VA 22202



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7217 Lancaster Pike, Suite A  
Hockessin, Delaware 19707

Dear Ms. Ballard:

Re: Registrant Response to EPA Generic Data Call-In Notice, DCI ID #GDCI-129099-1516

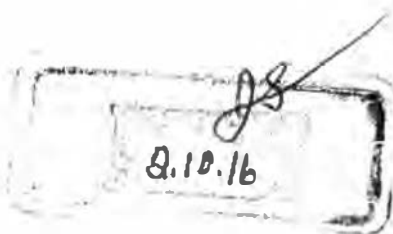
Wagner Regulatory Associates, Inc., as agent for Willowood Imidacloprid, LLC, respectfully submits the enclosed response to the subject Data Call-In Response. Enclosed are the following documents for EPA's review and consideration:

- An Agent letter from Willowood Imidacloprid, LLC authorizing WRA, Inc. to make this response.
- Data Call-In Response form (6300-4)
- Requirements Status and Registrant's Response form (6300-3)
- Certification of Attempt to Enter into Cost Sharing Agreement (8570-32)
- Copy of the offer to cost share letters submitted to registrants dated Feb. 8, 2016

Please feel free to contact me via email at [cheryl@wagnerreg.com](mailto:cheryl@wagnerreg.com) or telephone at (302) 635-7289.

Respectfully submitted,

Cheryl Wagner  
Agent for Willowood Imidacloprid LLC



WILLOWOOD IMIDACLOPRID, LLC

June 27, 2011

To: Whom It May Concern:

Re: Designation of Agent for,  
Willowood Imidacloprid, LLC  
1600 NW Garden Valley Blvd.  
Suite 120  
Roseburg, OR 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Imidacloprid, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its imidacloprid products that Willowood Imidacloprid, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Imidacloprid, LLC and its products to:

Wagner Regulatory Associates, Inc.  
P.O. Box 640  
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me at if you have any questions.

Respectfully submitted,

  
Brian Heinze  
President/CEO

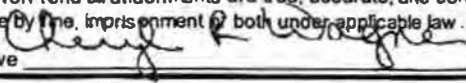
cc: WRA, Inc.

1600 NW Garden Valley Blvd., Suite 120 | Roseburg, Oregon 97471

United States Environmental Protection Agency  
Washington, D.C. 20460  
**DATA CALL-IN RESPONSE**

OMB Approv 12070-0174  
EPA FORM 6300-4

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address WILLOWOOD IMIDACLOPRID, LLC P.O. Box 640 HOCKESSIN, DE 197070640		2. Case # and Name N/A - Imidacloprid Chemical # and Name: 129099 Imidacloprid		3. Date and Type of DCI and Number 14-Oct-2015 GENERIC ID # GDCI.129099-1516	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data Requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirement on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirement on the attached form entitled "Requirements Status and Registrant's Response."
88544-2			X	NA	NA
8. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.					9. Date
Signature and Title of Company's Authorized Representative  Agent for Willowood Imidacloprid, LLC					February 8, 2016
10. Name of Company Willowood Imidacloprid, LLC					11. Phone Number 802-635-2789

United States Environmental Protection Agency  
Washington, D.C. 20460  
**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

OMB Approval 2070-0174  
EPA FORM 6300-3

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address  WILLOWOOD IMIDACLOPRID, LLC P.O. Box 640 HOOKESSIN, DE 197070640		2. Case # and Name  N/A - Imidacloprid Chemical # and Name: 129099 Imidacloprid			3. Date and Type of DCI and Number  14-Oct-2015 GENERIC ID # GDCI-129099-1516				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.4300  850.4100 850.4150 850.4400  875.2300	Environmental Fate Data Requirements (Conventional Chemical)  Aerobic aquatic metabolism (1)	N				K,R,U,A,Q,B,S,J,T,BB	EP, PAI, TGA	3	3
	Nontarget Plant Protection Data Requirements (Conventional Chemical)  Terrestrial Plant Toxicity (Seedling Emergence) (1)	N				K,R,U,A,Q,B,S,J,T,BB	TEP	3	3
	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (1)	N				K,R,U,A,Q,B,S,J,T,BB	TEP	3	3
	Aquatic plant toxicity test using Lemna spp. Tiers I and II (1)	N				K,R,U,A,Q,B,S,J,T,BB	EP, PAI, TGA	3	3
	Post-Application Exposure Data Requirements (Conventional Chemical)  Indoor surface residue dissipation (1)	Y				K,R,U,A,Q,B,S,J,T,BB	TEP	3	3
10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.  Signature and Title of Company's Authorized Representative <u>Cheryl K. Wagner</u> Agent for Willowood Imidacloprid, LLC							11. Date  February 8, 2016		
12. Name of Company  Willowood Imidacloprid, LLC						13. Phone Number 302-635-7289			

**INSTRUCTIONS:** Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address WILLOWOOD IMIDACLOPRID, LLC P.O. Box 640 HOCKESSIN, DE 197070640		2. Case # and Name N/A - Imidacloprid Chemical # and Name: 129099 Imidacloprid			3. Date and Type of DCI and Number 14-Oct-2015 GENERIC ID # GDCI-129099-1516				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
850.3040	Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)  Field testing for pollinators (1)	Y				K,R,U,A,Q,B,S,J,T,BB	TEP	3	3
870.7800	Toxicology Data Requirements (Conventional Chemical)  Immunotoxicity (1)	N				K,R,U,A,Q,B,S,J,T,BB	TGA1	3	3
835.SS01	Seed Leaching Study (1)	Y				K,R,U,A,Q,B,S,J,T,BB	EP, PA; TGA1	3	3
SS-1113	Residue Analysis of Nectar and Pollen in Flowering Crops (1)	Y				K,R,U,A,Q,B,S,J,T,BB	EP, PA; TGA1	3	3

United States Environmental Protection Agency  
Washington, D.C. 20460

**FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS**

Case # and Name: NA - Imidacloprid

OCI Number: GDCI-129099-1516

Key: Residue of Concern = Residue of Concern; TEP = Typical End Use Product (TEP); TGA = Technical Grade Active Ingredient (TGA); TGA/PAIRA = Technical Grade of the Active Ingredient or Pure Active Ingredient, Radio Labelled; TGA, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGA/PAI = Technical Grade Active Ingredient, Pure Active Ingredient

**Use Categories Key:**

A - Terrestrial food crop

B - Terrestrial feed crop

J - Forestry use

K - Residential

Q - Residential outdoor use

R - Agricultural premises and equipment

S - Food handling/storage establishments premises  
and equipment

T - Commercial, Institutional and Industrial premises  
and equipment

U - Residential and public access premises

BB - Wood preservatives

Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

1 This data was originally required in GDCI-129099-951, which was issued November 10, 2010. The study due dates in GDCI-129099-1516 reflect only the 90 day response period as the data generation period has passed.

United States Environmental Protection Agency  
Washington, D.C. 20460

OMB Approval 2070-0174

**LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE**

Case # and Name: N/A - Imidacloprid

DCI Number: GDC-129099-1516

Co. Nr.	Company Name	Agent For Company	Address	City	State	ZIP
88544	WILLOWOOD IMIDACLOPRID, LLC	LORI KOHLER	P.O. Box 640	HOOKESSIN	DE	197070640



United States Environmental Protection Agency  
Washington, D.C. 20460

CERTIFICATION OF ATTEMPT TO ENTER INTO AN  
AGREEMENT WITH REGISTRANTS FOR  
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;  
2070-0107; 2070-0122;  
2070-0164

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Willowood Imidacloprid, LLC

Company Number

88544

Chemical Name

Imidacloprid

EPA Chemical Number

129099

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Lanxess Corp., Celsius Property B.V., Amsterdam, Bayer Environmental Science, Source Dynamics, Bayer Cropscience, Control Solutions, United Phosphorus, Nufarm Americas, Ensystex III, Tide International, Amtide LLC, Advan LLC, Nufarm Americas, Inc., Nufarm, Albaugh, Sharda Worldwide Exports Pvt Ltd.

Date of Offer

February 8, 2016

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date

February 8, 2016

Name and Title (Please Print or Type)

Cheryl Wagner, Agent for Willowood Imidacloprid, LLC